

### REMARKS

Claims 1-6, 8-16, 18, and 20-23 are currently pending in the patent application. The Examiner has rejected Claims 1-6, 8-16, 18 and 20-23 under 35 USC 112 as failing to comply with the written description requirement. Applicants respectfully disagree with the Examiner's conclusion that the Specification does not teach that the server is an Internet source of the map service information. As noted by the Examiner, the Specification teaches that people are now able to obtain a variety of information from the world via the Internet (page 1, lines 9-10). The Specification repeatedly teaches that the information provided to the user is "service information on a server" (see: page 1, lines 6, and throughout the Specification and claims). On page 1, lines 13-14, the Specification teaches that people "access various information services" from servers. On page 2, line 11, the Specification teaches that "it is easy to access a variety of information provided by a server". On page 3, lines 1-2, the Specification teaches "providing service information on a server". On page 4, lines 5-6, the Specification describes Fig. 1 teaching "a server 3, on which a variety of service information such as map

information are stored". On page 5, line 7, with reference to Fig. 2, the passage states "the server 3 provides corresponding map information for the user device". Similarly, page 8 includes reference to Figs. 5 and 6 describing "in the server 3... the service provider can make corresponding modifications to the data stored in the database". Clearly the Specification is teaching that the server is the source of the map service information that it provides to the user. Applicants respectfully assert that the meaning is apparent to anyone reading the Specification. Applicants request reconsideration of the 112 rejection.

The Examiner has also rejected Claims 1-6, 8-16, 18 and 20-23 under 35 USC 112 as indefinite for use of "the Internet". The language of the independent claims has been amendment to recite "an Internet source".

Claims 1-4, 6, 8-13, 15-16, 18, and 20-23 under 35 USC 103 as being unpatentable over the Yu patent in view of the Tuli patent; and, has rejected Claims 5 and 14 under 35 USC 103(a) as being unpatentable over Yu in view of Tuli and further in view of Shteyn. For the reasons set forth below, Applicants believe that the claims are patentable over the cited art.

The present invention addresses the problem of communicating service information, and more specifically, map service information, from a server that is the Internet source that stores the map service information to a user device having limited capability to display and interact with the information. Under the present invention, user input commands are sent to a command processing means which is independent of the user device and of the server having the map service information. The command processing means interprets the user input and sends the interpreted user input to the map service server. Upon receipt of the interpreted user input commands, the map service server obtains service mapping parameters correlated to the interpreted user input commands, retrieves the map service information from its storage, modifies the map service information based on the service mapping parameters, and sends the modified map service information to the user device. The user device can then display and interact with the received service map information, since the received service map information has been correlated to the input capabilities of the user device (see: the Specification at page 6, lines 15-22, etc.). The command processing means and the server may access user data at a database, which user data may include service mapping parameters, a user

identifier, and type of user device. In addition, the user data may be modified by either the server or the user device. Applicants believe that the invention as claimed is neither taught nor suggested by the cited art.

The Yu patent is directed to a method and apparatus for displaying images on mobile devices wherein the user device sends its request for resource information to a link server (300 of Fig. 3). At the link server, user access and device parameter information is stored based on a subscription (Col. 6, lines 30-58). The link server sends the user request to the service/resource server. Once the link server obtains the requested resource information from the service/resource server, it preprocesses the retrieved resource information for the subscribing user using the stored device parameters (see: Col. 7, lines 11-20). As is expressly taught in Col. 8, lines 12-14, "[i]t must be pointed out, the received image...is not the image originating from the resource". Accordingly, the link server of Yu retrieves information from a resource server based on the user request and then preprocesses (e.g., performs protocol conversion on) the information for delivery to the user.

The Examiner has acknowledged that Yu does not teach or suggest that the internet source of the image

information modifies the stored image information for the user device. Rather, the link server performs that function. The Examiner has cited the Tuli patent as providing the teachings which are missing from the Yu patent. The Tuli patent is directed to a portable device which allows a user to access the Internet through a cellular telephone. Under Tuli, the portable device comprises a modem that connects to a cellular phone to obtain a wireless connection to a host computer that is connected to the Internet. Once the connection is established, a user at the portable device can click on text or images (Col. 1, lines 41-43) that represent links to Web pages. The Web server program at the host computer retrieves the requested information from the Internet and provides the retrieved information to a Browser Translator, which "translates the information into a black and white bit map or raster image" (Col. 1, lines 35-36 and Col. 2, lines 24-30). Under one embodiment of Tuli, the bit map or image is then divided into sections, and compresses and transmits only one section at a time to the portable device (Col. 2, lines 39-44). In another embodiment of Tuli, the "display of the palm top device mirrors the entire virtual browser window...[whereby the] user views a bit map or

raster image that represents the entire window" (Col. 4, lines 53-55).

Applicants respectfully disagree with the conclusion that the Examiner reaches with respect to the Tuli teachings. Tuli provides a Browser Translator at a host computer. The host computer is an intermediate server and is not the source server for the image information. Tuli expressly teaches (see: the Abstract, lines 1-3; Col. 1, lines 32-33; Col. 2, lines 19-24; Col. 3, lines 26-27) that the host computer is connected to the Internet and retrieves requested information from the Internet (i.e., from the Internet server that is the source of the information). Tuli does not provide the teachings which are missing from Yu because Tuli also teaches an intermediate entity that performs the translation of information and sends the translated information to the user device.

Furthermore, there is no teaching or suggestion in Tuli that the Web server or the Browser Translator performs the translation based on received user input regarding user device capabilities. Tuli does not teach that the user provides capability information or that the server has or obtains that information. It must be concluded, therefore, that Tuli performs the translation and compression without

actual knowledge of the capabilities of the portable device. Moreover, Tuli does not provide any teachings about correlating service mapping parameters for modifying retrieved information based on user input commands. Tuli simply provides a preset translation of web information in a preset format.

Applicants reiterate that neither Yu nor Tuli teaches that a server on which a variety of service information such as map information are stored (see: page 4, lines 5-6 of original Specification) customizes the information for display at a particular user device based on interpreted user input received in the request from the user device. The presently pending claims expressly teach that the service provider/server which is the source of the map service information obtains service mapping parameters correlated to the input capabilities of the user based on the interpreted user input and then retrieves the stored map service information, modifies the map service information based on the service mapping parameters and sends the modified map service information from the server to the user device (see: page 8, line 4 of the Specification which teaches that "the service provider can make corresponding modifications to the data stored in the database").

Further with regard to the obviousness rejections of Claims 5 and 14, Applicants rely on the discussion of the Yu and Tuli patents presented above, and respectfully assert that the Shteyn patent does not provide those teachings which are missing from the Yu patent. Shteyn is cited for disclosing that a user can initiate a change in preferences or profiles that are stored in a remote database. Modifying Yu and Tuli so that a user can change subscription information stored at the server would not result in the invention as claimed, since none of the cited references teaches or suggests the claimed steps and means for the server to dynamically modify map service information us service mapping parameters correlated for the input capabilities of the user device. Accordingly, Applicants conclude that the invention is not obviated by the cited art.

Under U.S. Patent Law, for a determination of obviousness, the prior art must teach or suggest all of the claim limitations. "All words in a claim must be considered in judging the patentability of that claim against the prior art" (In re Wilson, 424 F. 2d 1382, 1385, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970)). If the cited references fail to teach each and every one of the claim limitations, a *prima facie* case of obviousness has not been

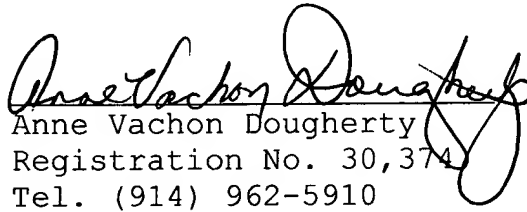


established by the Examiner. Applicants respectfully conclude that obviousness has not been established by the Examiner since neither Yu nor Tuli teaches that the source server modifies its stored content based on user service mapping parameters and provides the modified content to the user.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,  
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